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June 20, 2024

*Via ECF*

The Honorable John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 14A  
New York, New York 10007

*Re:     Turnbull v. JPMorgan Chase & Co., Index No. 1:21-cv-03217-JGK*

Your Honor:

This firm represents Donald Turnbull. We write on behalf of both parties, and pursuant to the Court's direction (ECF No. 100), to provide an update regarding settlement efforts. The parties and Plaintiff's third-party funder have reached an agreement in principle. The parties and the third-party funder require additional time to finalize that agreement, which we expect will take an additional month. Upon execution of that agreement, this case will be dismissed with prejudice. Accordingly, the parties jointly request a continued stay of fact and expert discovery through July 19, 2024, at which point the parties will file a joint status report regarding the parties' ongoing discussions and, if necessary, a joint proposal regarding remaining discovery deadlines.

Respectfully submitted,

/s/

Eric Abrams

cc.     All Counsel of Record